

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

CASE NO. 3:18CR26

Plaintiff,

JUDGE JAMES G. CARR

v.

GOVERNMENT'S WITNESS LIST

KARL ROGERS

Defendant.

Although a witness list was not ordered to be filed in this case, the United States of America, through the U.S. Attorney for the Northern District of Ohio, Justin E. Herdman, by Assistant U.S. Attorneys, Tracey B. Tangeman and Matthew D. Simko, hereby submits its list of prospective witnesses at trial. However, the government reserves the right to call in its case-in-chief or on rebuttal any witness who has been identified in discovery, who establishes that a minor victim depicted is a real child, or who establishes chain of custody.

Name	Agency
TFO Ryan Anschutz	Federal Bureau of Investigation
TFO Bryan Allen	Federal Bureau of Investigation
SA Michael Sirohman	Federal Bureau of Investigation
SA Todd Krajeck	Federal Bureau of Investigation
SA Drew Stragar-Rice	Federal Bureau of Investigation
Inv. Jason Howell	Internet Crimes Against Children Unit, Cuyahoga County Prosecutor's Office
Keeper of Records	Frontier Communications, Everett, Washington

Professor Brian Levine	University of Massachusetts, Amherst – Expert in Freetnet Law Enforcement Tool
<i>If the defense does not stipulate that the children depicted are real children, the government may also call one or more of the following witnesses, all of whom are listed in Reports from the National Center for Missing and Exploited Children in discovery:</i>	
Tracy Villadival	McLennan County District Attorney's Office, Texas
SA Matt Wright	DHS Immigration and Customs Enforcement, Oklahoma
SA Tracie Smith	Federal Bureau of Investigation, Oklahoma
SA Rhonda Daniel	Georgia Bureau of Investigation, Georgia
SA Glenn Covington	DHS Immigration and Customs Enforcement, North Carolina
TFO Chris Chappell	Federal Bureau of Investigation, North Carolina
SA Peter Amodeo	DHS Immigration and Customs Enforcement, Georgia
SA Jamie West	DHS Immigration and Customs Enforcement, Vermont
Det. Sgt. John Merrigan	Vermont State Police – Rockingham Barracks

Respectfully submitted,

JUSTIN E. HERDMAN
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

On January 18, 2019, the foregoing document was filed electronically with the Court's CM/ECF system, which will send electronic notification to counsel of record.

/s/ Tracey Ballard Tangeman
Tracey Ballard Tangeman
Assistant United States Attorney